

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

---

In the Matter of an Arbitration Between:	)
PT SUMOHADIWIDJOJO,	) CIVIL ACTION NO. 04 12646 NG
Applicant	) RESPONDENTS' MOTION FOR LEAVE TO
(Respondent below)	) FILE A REPLY MEMORANDUM IN
and	) SUPPORT OF THEIR MOTION TO VACATE
BSB RESIDUAL ASSETS TRUST,	) OR REDUCE <i>EX PARTE</i> ATTACHMENT
BSB TRUST COMPANY, LTD., Trustee,	)
Respondent	)
(Claimant below).	)
<hr/>	
CITIZENS BANK	)
Trustee	)
<hr/>	

---

Respondents BSB Residual Assets Trust and BSB Trust Company, Ltd., Trustee, (together “BSB”) hereby move, pursuant to Local Rule 7.1(B)(3), for leave to submit the accompanying Respondents’ Reply Memorandum in Support of Respondents’ Motion to Vacate or Reduce *Ex Parte* Attachment (“Reply Memorandum”).

As grounds for this motion, BSB states that Applicant PT Sumohadiwidjojo (“PTSW”) has stipulated that BSB may file a Reply Memorandum. Furthermore, on March 11, 2005, the Registrar of the Singapore International Arbitration Centre (“SIAC”) issued a certificate taxing costs in the SIAC arbitration in an agreed amount of approximately \$287,000. This change in the pertinent facts occurred after BSB filed its Motion to Vacate or Reduce *Ex Parte* Attachment (“Motion”) but before PTSW filed its opposition thereto, such that PTSW was able to address it

but BSB was not. BSB further submits that the arguments contained in the Reply Memorandum will assist the Court in deciding the issues raised by the Motion.

BSB RESIDUAL ASSETS TRUST  
AND BSB TRUST COMPANY, LTD.,  
TRUSTEE, Respondent

By its attorney,

/s/ Richard A. Johnston  
Richard A. Johnston (BBO # 253420)  
WILMER CUTLER PICKERING  
HALE AND DORR LLP  
60 State Street  
Boston, MA 02109  
(617) 526-6000  
[richard.johnston@wilmerhale.com](mailto:richard.johnston@wilmerhale.com)

Dated: March 28, 2005